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Attorneys for Defendant Vidocq Society

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
EUGENE DIVISION

NICHOLAS JAMES MCGUFFIN, as an individual and as guardian *ad litem*, on behalf of S.M., a minor,

Civil Case No. 6:20-CV-01163-MTK
(Lead Case)

Plaintiffs,

v.

MARK DANNELS, PAT DOWNING, SUSAN HORMANN, MARY KRINGS, KRIS KARCHER, SHELLY MCINNES, RAYMOND MCNEELY, KIP OSWALD, MICHAEL REAVES, JOHN RIDDLE, SEAN SANBORN, ERIC SCHWENNINGER, RICHARD WALTER, CHRIS WEBLEY, ANTHONY WETMORE, KATHY WILCOX, CRAIG ZANNI, DAVID ZAVALA, JOEL D. SHAPIRO AS ADMINISTRATOR OF THE ESTATE OF DAVID E. HALL, VIDOCQ SOCIETY, CITY OF COQUILLE, CITY OF COOS BAY, and COOS COUNTY,

DEFENDANT VIDOCQ SOCIETY'S MOTION FOR EXTENSION OF TIME TO FILE REPLY BRIEF

Defendants.

DEFENDANT VIDOCQ SOCIETY'S MOTION FOR EXTENSION OF TIME TO FILE REPLY BRIEF-Page 1

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VIDOCQ SOCIETY,
Cross-Claimant.

v.

MARK DANNELS, PAT DOWNING,
SUSAN HORMANN, MARY KRINGS,
KRIS KARCHER, SHELLY MCINNES,
RAYMOND MCNEELY, KIP OSWALD,
MICHAEL REAVES, JOHN RIDDLE,
SEAN SANBORN, ERIC
SCHWENNINGER, RICHARD WALTER,
CHRIS WEBLEY, ANTHONY WETMORE,
KATHY WILCOX, CRAIG ZANNI, DAVID
ZAVALA, JOEL D. SHAPIRO AS
ADMINISTRATOR OF THE ESTATE OF
DAVID E. HALL, CITY OF COQUILLE,
CITY OF COOS BAY, and COOS COUNTY.

Cross Defendants

NICHOLAS JAMES MCGUFFIN, as an
individual and as guardian *ad litem*, on behalf
of S.M., a minor,

Plaintiffs,

v.

OREGON STATE POLICE,
Defendant.

Civil Case No. 3:21-cv-01719-MTK
(Trailing Case)

CERTIFICATE OF CONFERRAL

Pursuant to LR 7-1, undersigned counsel has conferred in good faith with the respective parties' counsel in this action before filing this motion. All counsel have advised that they do not object to the relief requested by Vidocq Society.

MOTION FOR EXTENSION OF TIME

Defendant Vidocq Society respectfully moves for an order extending the deadline for Vidocq Society to file its Reply brief in support of its Motion for Summary Judgment. Vidocq

requests a one week extension of time to file its Reply brief, with the new deadline being set for March 18, 2025.

As explained in the concurrently filed Declaration of Meredith A. Sawyer, Vidocq Society's request is based upon counsel's personal circumstances in which counsel is experiencing a serious medical issue that was only recently diagnosed and which requires immediate treatment. This medical issue is continuing in nature through the present time and has impacted counsel's ability to attend to and focus on the completion of the Reply brief in support of Defendant Vidocq Society's Motion for Summary Judgment. *See*, Declaration of Meredith A. Sawyer.

RESPECTFULLY SUBMITTED, this 7th day of March, 2025.

HWS LAW GROUP

BY: /s/ Meredith A. Sawyer

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Attorneys for Defendant Vidocq Society

CERTIFICATE OF SERVICE

I certify under penalty of perjury under the laws of the State of Oregon, that the following is true and correct:

I am employed by the law firm of HWS Law Group.

At all times hereinafter mentioned, I was and am a citizen of the United States of America, a resident of the State of Washington, over the age of eighteen (18) years, not a party to the above-entitled action, and competent to be a witness herein.

On the date set forth below I served the document(s) to which this is attached, in the manner noted on the following person(s):

PARTY/COUNSEL	DELIVERY INSTRUCTIONS
CO / Plaintiffs Janis C. Puracal Andrew C. Lauersdorf Maloney Lauersdorf Reiner PC 1111 E. Burnside Street, Suite 300 Portland, OR 97214	<input type="checkbox"/> Via U.S. Mail <input checked="" type="checkbox"/> Via E-Mail <input type="checkbox"/> Via Overnight Mail <input checked="" type="checkbox"/> Via Court E-Service, if applicable jcp@mlrlegalteam.com acl@mlrlegalteam.com cv@mlrlegalteam.com ms@mlrlegalteam.com
CO / Plaintiffs David B. Owens, <i>Pro Hac Vice</i> Loevy & Loevy 100 S. King Street, Suite 100 Seattle, WA 98104-2885	<input type="checkbox"/> Via U.S. Mail <input checked="" type="checkbox"/> Via E-Mail <input type="checkbox"/> Via Overnight Mail <input checked="" type="checkbox"/> Via Court E-Service, if applicable david@loevy.com
CO / Defendants City of Coquille, City of Coos Bay, Coos County, Craig Zanni, Chris Webley, Eric Schwenninger, Sean Sanborn, Ray McNeely, Kris Karcher, Pat Downing, Mark Dannels, Kip Oswald, Michael Reaves, David Zavala, Anthony Wetmore and Shelly McInnes Robert E. Franz, Jr. Sarah R. Henderson Law Office of Robert E. Franz, Jr. PO Box 62 Springfield, OR 97477	<input type="checkbox"/> Via U.S. Mail <input checked="" type="checkbox"/> Via E-Mail <input type="checkbox"/> Via Overnight Mail <input checked="" type="checkbox"/> Via Court E-Service, if applicable rfranz@franzlaw.comcastbiz.net shenderson@franzlaw.comcastbiz.net
CO / Defendants John Riddle, Susan Hormann, Mary Krings, Kathy Wilcox, and Oregon State Police Jesse B. Davis Todd Marshall Kristen Hoffmeyer Oregon Department of Justice 100 SW Market Street Portland, OR 97201	<input type="checkbox"/> Via U.S. Mail <input checked="" type="checkbox"/> Via E-Mail <input type="checkbox"/> Via Overnight Mail <input checked="" type="checkbox"/> Via Court E-Service, if applicable jesse.b.davis@doj.oregon.gov todd_marshall@doj.oregon.gov kristen.hoffmeyer@doj.oregon.gov maureen.a.mccarthy@doj.oregon.gov jennifer.burdick@doj.oregon.gov

CO / Defendant Richard Walter Eric S. DeFreest Luvaas Cobb 777 High Street, Suite 300 Eugene, OR 97401	<input type="checkbox"/> Via U.S. Mail <input checked="" type="checkbox"/> Via E-Mail <input type="checkbox"/> Via Overnight Mail <input checked="" type="checkbox"/> Via Court E-Service, if applicable edefreest@luvaascobb.com KWorkman@luvaascobb.com
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DATED this 7th day of March, 2025.

/s/ Caroline Bryant
 Caroline Bryant, Legal Assistant